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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 09/18/2015

September 17, 2015

SO ORDERED. Pursuant to Order No. 77, the parties shall refile and/or submit under seal the relevant materials by Wednesday, September 23, 2015.

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007



September 18, 2015

Re: In re: General Motors LLC Ignition Switch Litigation,
14-MD-2543 (JMF)

Dear Judge Furman:

Pursuant to this Court's September 10, 2015 Memo Endorsement (Doc. No. 1356), counsel for General Motors LLC ("New GM") submit this letter to notify the Court that New GM does not have any objection to Plaintiffs' September 8, 2015 letter brief (Doc. No. 1345) being filed publicly in unredacted form as the brief is a judicial document, with the exception of the redaction in footnote three, which reflects personally sensitive employment information protected by Order Nos. 10 and 71.

New GM does not believe, however, that the exhibits to Plaintiffs' brief are judicial documents, as the Court did not appear to consider them in rendering the decision issued on September 10, 2015. *See* August 25, 2015 Memo Endorsement (Doc. No. 1282) (finding that the exhibit to Plaintiffs' brief was not a judicial document); *Saleem v. Corporate Transp. Grp., Ltd.*, No. 12 CIV. 8450 JMF, 2013 WL 6061340, at *8 (S.D.N.Y. Nov. 15, 2013) (finding that since the Court did not rely on information in certain exhibits, those exhibits did not have to be published); *Citigroup, Inc. v. Abu Dhabi Inv. Auth.*, 2013 WL 6171315, at *7 S.D.N.Y. Nov. 25, 2013) (maintaining sealed or redacted status of documents that "played no role in this Court's adjudication of the parties' respective motions" or "were immaterial to the analysis and outcome of the Memorandum and Order"), *aff'd*, 776 F.3d 126 (2d Cir. 2015).

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Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record